



Rustin Holzer, hired me to work as a part-time stable manager at River Ridge which, among other things, operates a stable for boarding horses. I work full time for the New York Times. I am a delivery truck driver for the paper and have worked there since 1987.

3. My duties as a part-time stable manager were to insure the safety and care of the horses and manage the daily operation of the stable that housed them. I supervised the distribution of the horses' feed and medications. I also supervised the cleaning of the horses' stalls and any necessary minor repairs to the stable.

4. I performed my duties under the supervision of Holzer, who would instruct me about stable operations and maintenance. Holzer has at all times made the final decisions regarding stable management.


5. I had no involvement whatsoever in the preparation or filing of River Ridge's federal or state tax returns and had no contact with any bank with which it did business. I have no ownership interest in or control over River Ridge. I did not participate in any alleged attempt to evict plaintiff from River Ridge. Plaintiff continues to board her horse at River Ridge.

6. I have never communicated with Plaintiff by email, mail, or telephone.

7. I deny the allegations in the Amended Verified Complaint insofar as they concern me.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 8, 2009.

  
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ANTHONY ZUMPANO